



United States Department of the Interior

NATIONAL PARK SERVICE
Sequoia and Kings Canyon National Parks
47050 Generals Highway
Three Rivers, California 93271-9651
(559) 565-3341



IN REPLY REFER TO
N3617

March 17, 2009

Mr. Danny McClure
Regional Water Quality Control Board
Central Valley Region
11020 Sun Center Drive, #200
Rancho Cordova, California 95670-6114

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Dear Mr. McClure:

The Water Quality Control Board is considering adding the North Fork Kern to the 303(d) list of "impaired" water bodies due to the pH value exceeding the standard on 38 of 68 samples. The data that supports this decision comes exclusively from the lower end of the river. The upper North Fork Kern is a Wild and Scenic River located within the Sequoia - Kings Canyon Wilderness. The most recent data that Sequoia National Park has for the upper Kern was collected by the USGS in 1978-1979. It shows pH values of 7.08-7.52 at four stations (collected mid-September) extending from the Park boundary upstream to the junction with Milestone Creek. Human activity in that area has not changed substantially since that data was collected. The upper Kern continues to be within designated wilderness lacking developments other than a few trails and a few rustic ranger stations. Human visitation is very low. There has been no change in the management of that area that would have caused an increase in the pH of the waters.

The notice of waters proposed for addition to the 303(d) list did not provide any indication of the agency seeking a source for the high pH values. We know from local experience that high pH values sometimes occur naturally in waters where marble is prevalent. Natural mineral springs can also cause significant effects to water quality.

We believe that it would be inappropriate to declare the upstream waters as impaired without data from those areas. Furthermore, waters should not be declared impaired without evidence of an anthropogenic cause.

Sincerely,

Craig C. Axtell
Superintendent

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